

Memorandum



EAD

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DATE : August 12, 1983
TO : Al Cuplin, George Rauch and Larry Tuffs
FROM : Katherine Fletcher *Kathy C. M. per*
SUBJECT: PCB Compliance

This memo from American Public Power Association (APPA) provides a good opportunity to remind employees in your division that PCB practices for which they are responsible must be exact. Our experience with the Environmental Protection Agency (EPA) inspection last summer was similar to those of utilities mentioned in the memo, namely that most of our violations were technical in nature. However, we will not be so fortunate as to receive only a warning should another inspection occur.

Please call Joanne Asaba (X3798) or Claire Dyckman (X3568) of my staff if you need assistance on this matter. They will be confirming PCB practices within your division in the compliance audit, and will be working with you on divisional inspection schedules.

Thank you.

CD:mlr

Attachment

cc: Macdonald
Sickler
Hunich
Mandapat
Asaba
Dyckman
EAD (3)
File

Pgr 10A
APPA



AMERICAN PUBLIC POWER ASSOCIATION

2301 M STREET NW WASHINGTON DC 20037 • 202/775-8300

July 26, 1983

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Supt/EAD ✓

TO: APPA Member Utilities

FROM: Alex Radin

SUBJECT: PCB Enforcement

It has come to my attention that several APPA members have recently been fined by EPA for PCB reporting and handling violations. These fines have ranged from \$10,000 and up, for infractions that in some instances can only be characterized as extremely minor. While it is not clear that these fines represent a concerted effort by EPA to tighten PCB enforcement, I urge you to assess your compliance with current PCB handling, disposal, marking and storage regulations.

For assistance in evaluating your present PCB compliance program, I refer you to:

- August 25, 1982 memo to you from Mike Bergman of the APPA staff
- August 25, 1982 *Federal Register* publication of the new final PCB regulations (Vol. 47, 165)

Copies of these may be obtained from Mr. Bergman.

In addition, the National Rural Electric Cooperative Association (NRECA) has made a very fine PCB manual available to APPA members. The 146-page report is entitled, *PCB Equipment, Operations & Management Reference Manual*. The report incorporates all recent changes in PCB regulations and also contains a complete listing of the revised PCB rules. Copies may be obtained from Barbara Opicka of APPA's publications department. The cost to APPA members is \$20, non-members \$25.

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